

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template
EB Docket 06-36**

Submission Confirmation Number:

Annual 64.2009(e) CPNI Certification for 2012 covering the prior calendar year:

2011

1. Date filed:

Feb 8 2012 11:07AM

2. Name of company(s) covered by this certification:

- 800 Special Services LLC (828406)

3. Form 499 Filer ID(s):

828406

4. Name of signatory:

Dennis D. Somers

5. Title of signatory:

President

6. Certification:

I, Dennis D. Somers [name of officer signing certification], certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company [☐ has ☒ has not] taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. [NOTE: If you reply in the affirmative, please provide an explanation of any actions taken against data brokers.]

The company [☐ has ☒ has not] received customer complaints in the past year concerning the unauthorized release of CPNI [NOTE: If you reply in the affirmative, please provide a summary of such complaints. This summary should include number of complaints, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not

authorized to view the information.]

The company represents and warrants that the above certification is consistent with 47. C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: [☒ Yes ☐ No Signature of an officer, as agent of the carrier]

Thomas H. Jones, President

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Customer Proprietary Network Information (CPNI)
Documentation of Operating Procedures

for

800 Special Services, LLC

- CPNI rules are reviewed on a regular basis with employees. Employees with access to CPNI have been trained on when they are, and are not, authorized to use CPNI.
- Company does not provide CPNI to third parties.
- Company has a defined disciplinary process in place for violations and for improper use of any customer information, including CPNI.
- Currently, our company markets a product or service to its entire customer base or it uses the “total service approach” which allows it to use CPNI to market offerings related to the customer’s existing service to which the customer currently subscribes.

If, in the future, the company wants to use CPNI to market outside of the total service approach, a process will be developed for notifying customers of their CPNI rights and for requesting approval to use CPNI. At the same time a process will be established for noting customer accounts when notification is given and noting the approval/denial status on each customer account. The company will also establish a supervisory review process for any outbound marketing campaigns.

ATTACHMENT

Customer Proprietary Network Information (CPNI)

Certification Filing

for

800 Special Services, LLC

In accordance with 47 CFR § 64.2009(e), I, Dennis D. Somers, hereby certify that I have personal knowledge that **800 Special Services, LLC** has established operating procedures, as described in the attached documentation, that are adequate to ensure compliance with the FCC's CPNI rules (47 CFR §§ 64.2001 *et seq.*).

I hereby certify that the information contained in this Certificate and the attached documentation is accurate and complete to the best of my knowledge, information and belief.

Signed:

Dennis D. Somers

Printed Name:

Dennis D. Somers

Title:

President

Date:

2/8/2012

Attachment